



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

OFFICE OF THE CHIEF COUNSEL

July 7, 2020

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The Honorable Doug Lamborn  
Member, U.S. House of Representatives  
1125 Kelly Johnson Blvd, Suite 330  
Colorado Springs, CO 80920

Attention:

Dear Representative Lamborn:

I am responding to your inquiry dated June 15, 2020, on behalf of your constituent, [REDACTED], explained he received his required minimum distribution (RMD) in January 2020 and asked if he can roll over the RMD distribution back to his IRA.

Section 2203 of the CARES Act of March 27, 2020, waived all RMDs for the 2020 calendar year. Therefore, individuals can roll over any RMD paid from an IRA in 2020.

On June 23, 2020, we issued Notice 2020-51, to provide additional guidance related to Section 2203 of the CARES Act. Notice 2020-51 extended the deadline to roll over any 2020 RMD paid in January 2020 to August 31, 2020. In addition, individuals may repay amounts equal to the 2020 RMD into the IRA that distributed the RMD. That repayment will not be treated as a rollover for purposes of the "one rollover per year" rule.

Generally, an IRA owner has 60 days from the IRA distribution to roll over that amount to an IRA or other eligible retirement plan. However, on April 9, 2020, we issued Notice 2020-23, 2020-18 IRB 742, to extend the 60-day rollover distribution deadline to July 15, 2020 for distributions that would have been required to be rolled over between April 1, 2020, and July 15, 2020.

Therefore, individuals can roll over any 2020 RMD paid between February 1, 2020 and May 16, 2020, no later than July 15, 2020. However, the normal 60-day deadline still applies to any 2020 RMDs paid on or after May 16, 2020.

For your convenience, I have enclosed a copy of Notice 2020-23 and Notice 2020-51.

I hope this information is helpful. If you have any additional questions, please contact me at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

Sincerely,

Laura B. Warshawsky  
Branch Chief, Qualified Plans Branch 1  
(Employee Benefits, Exempt Organizations,  
and Employment Taxes)

Enclosures (2)